



Department of Energy
Strategic Petroleum Reserve Project Management Office
900 Commerce Road East
New Orleans, Louisiana 70123
87-ESH-209

June 3, 1987

US DOE SPR-
WEST HACKBERRY
LA 289 0032582

Mr. Jim Highland
Environmental Protection Agency
Region VI
Allied Bank Tower
1445 Ross Avenue
Dallas, Texas 75202-2733

SUPERFUND FILE

JUN 10 1992

Dear Mr. Highland:

DISPOSITION OF CONTAMINATED CONTENTS OF WELLS AT ^{REORGANIZED} BIG HILL

This letter is to confirm a request for a joint meeting with your agency and the Texas Railroad Commission (TRC) and Texas Water Commission (TWC) made by Mr. Sidney Evans of the Strategic Petroleum Reserve (SPR) environmental staff on May 26, 1987. We have requested this meeting to obtain your consensus in determining what regulations are applicable to our situation and possible courses of action for disposing of the issue of potentially contaminated well brines.

We have recently provided you with a copy of the SPR's Phase II CERCLA Report. Additional sampling involving the EP toxicity tests showed two of the wells to contain lead in concentrations greater than 5 mg/l, the threshold for hazardous waste. Subsequent independent review of the laboratory data on the brine analyses has revealed that the data is suspect. Accordingly, we plan to conduct resampling. In this endeavor we would like your advice regarding our planned course of action.

The SPR schedule requires that the Big Hill site be ready-to-start leach on October 1, 1987. Due to the shortness of time we request that this meeting be held on Friday, June 19, 1987, and suggest the Water Commission offices in Austin as the meeting place.

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Mr. Jim Highland

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The cavern development procedure being utilized at the Big Hill site involves the drilling of two wells for each of 14 crude oil storage caverns. The caverns are then solution mined by leaching through the two wells, and discharging the resulting brine offshore. Currently, the wells have all been drilled and leaching is scheduled to start in October.

The wells and storage caverns are permitted and regulated by the TRC but the brine discharge is permitted and regulated by EPA (NPDES Permit No. TX0092827) and the TWC (Permit No. 02638). The problem of selecting the appropriate disposal requirements for the wells involved is made more complex by the possibility of a determination of applicability of RCRA and State Rule 74 provisions for wastes associated with the exploration, development, or production of crude oil.

To assure availability of the Big Hill storage wells for leaching in October it will be necessary that requirements and, if necessary, a method of disposal acceptable to all parties be identified as soon as possible. The Strategic Petroleum Reserve representatives will be prepared to present updated data and background information at the meeting.

We would appreciate your reviewing your calendars and an early response. Mr. Sidney Evans ((504) 734-4353 or FTS 686-4353) or Ms. Melissa Smith ((504) 734-4387 or FTS 686-4387) will be contacting you regarding this matter.

Sincerely,


John D. Wagoner
Project Manager

cc:
Sam Pole, TWC
R. Ginn, TRC
Larry Hagen, TWC District 6